

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**



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Order Instituting Rulemaking to Revisit
Net Energy Metering Tariffs Pursuant to
Decision 16-01-044, and to Address
Other Issues Related to Net Energy
Metering.

Rulemaking 20-08-020
(Filed August 27, 2020)

**REPLY COMMENTS OF THE CALIFORNIA SOLAR & STORAGE
ASSOCIATION ON PROPOSED DECISION REVISING NET ENERGY METERING
TARIFF AND SUBTARIFFS**

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*On behalf of the California Solar & Storage
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Pursuant to Rule 14.3, CALSSA submits these Reply Comments on the PD.¹ NRDC, TURN, Cal Advocates, CUE, and the IOUs continue to single out DER customers for “holier than thou” sermons on alleged cost shifts while ignoring other cost shifts California has endorsed for decades. As CALSSA has argued throughout this proceeding, if low usage from *any type* of customer, including solar customers, is a concern for the Commission, it should be addressed by changing the rate design for all customers.² Further calls from the IOUs and their allies to worsen the PD’s deeply imbalanced approach must be rejected. Many of the modifications from these parties addressed in these Reply Comments will aggravate a PD that “despite its talk of modernization, is a throwback in time[,]” undermining California’s flagbearer status on energy innovation.³

While balancing the competing objectives facing the Commission is a challenging yet worthwhile aim of the PD,⁴ its alleged attempt to sustain growth in the State’s vibrant solar industry is built on sand.⁵ CALSSA’s Opening Comments demonstrate the substantial corrections necessary to build a strong foundation: eliminate the GPC; replace the MTC with a true glidepath for export rates; lock in tariff components for the full financing term; simplify export rates and revise them to account for lifecycle benefits; and honor the 20-year legacy period for NEM-1 and NEM-2 customers.

I. REJECT CALLS TO PILE MORE FEES ON MORE CUSTOMERS.

A. Standby Charges for *Non-NEM* Customers Should Not Be Adopted in a *NEM* Case.

The Commission must reject the IOUs’ proposal to revise the PD to add new standby charges for small, non-NEM solar generators⁶ because (1) policies related to non-NEM customers, or customers not taking service on the successor tariff, are clearly out of scope in this proceeding, (2) the record does not support the proposal, (3) the proposal is legally indefensible under PURPA, and (4) the Commission’s public policy rationales underlying the current standby charge policy remain strong.

The Commission’s decision to decline to consider the Joint IOUs’ standby charge proposal is not an “oversight.”⁷ This proceeding was scoped to consider seven issues, none of which can reasonably be

¹ The Dec. 17, 2021 ALJ ruling extended the deadline for reply comments on the PD to Jan. 14, 2022. All acronyms in these comments have the meaning set forth in Appendix A, and all citation abbreviations have the meaning set forth in *Opening Comments of CALSSA on PD Revising NEM Tariff and Subtariffs* (Jan. 7, 2022) (CALSSA Opening Comments).

² CALSSA Opening Brief, pp. 123-124.

³ *Comments of Ahmad Faruqui on the PD Revising NEM Tariff and Subtariffs*, p. 5 (Jan. 7, 2022).

⁴ See, e.g., PD at 50-51, 57, 126, 130, and FOFs 48, 55, 149, 160, 180, and 207.

⁵ CALSSA Opening Comments, pp. 8-20.

⁶ *Joint Opening Comments of SCE, PG&E and SDG&E on the PD Revising NEM Tariff and Subtariffs*, pp. 11-12 (Jan. 7, 2022) (Joint IOU Opening Comments).

⁷ *Id.*, p. 11.

argued to include these proposed modifications to the utilities' standby charge policy.⁸ Issues one through five are focused *exclusively* on the "successor to the current net energy metering tariff[.]"⁹ issue six focuses on "[o]ther issues that may arise related to *current net energy metering tariffs and subtariffs*,"¹⁰ and issue seven deals exclusively with consumer protections for customers taking service under NEM or the successor tariff.¹¹ The Joint IOUs' proposal cannot be defended as part of NEM or any proposed successor tariff because it would apply only to certain "*non-NEM/non-NBT*" generators;¹² taking service on the successor tariff would necessarily mean that this standby charge policy would be inapplicable.¹³ Since it is clear that none of these issues can be construed as encompassing a standby charge proposal for non-NEM and non-successor tariff customers, the Commission is barred from considering this proposal.

Even if the Commission takes the issue on without providing non-NEM, non-exporting customers the required notice,¹⁴ there is almost nothing on the record the utilities can even *claim* supports this proposal. The proposal is laid out in less than one page of testimony,¹⁵ with no briefing provided in support other than a footnote in a Reply Brief stating that CALSSA misunderstands the proposal.¹⁶ The Joint IOUs have not made clear anywhere on the record (1) the design of the standby charges, (2) whether that design is consistent with the attributes of the systems it would newly cover, *i.e.*, whether non-NEM customers have usage patterns that justify such standby charges, or (3) the impact of the proposal, *i.e.*, how high these charges would be and how many customers they would impact. Without any of these crucial details, the Commission does not have sufficient information to review such a significant policy change that is likely to have a substantial impact on non-NEM customers. One look at the Applicability section and the rates in the Commission-approved Standby Service Schedule for each IOU reveals that the charges were not designed for customers that regularly meet a portion of their electricity needs with power from the

⁸ *Joint Assigned Commissioner's Scoping Memo and Administrative Law Judge Ruling Directing Comments on Proposed Guiding Principles*, pp. 2-3 (Nov. 19, 2020) (Scoping Ruling).

⁹ *Id.*, pp. 2-3.

¹⁰ *Id.*, p. 3 (emphasis added).

¹¹ *Id.*, p. 3.

¹² Joint IOU Opening Comments, p. 11 (emphasis added).

¹³ The IOUs' Standby Service electric schedules are distinct from all NEM tariff and subtariff schedules.

¹⁴ This would constitute a due process violation. See *Pacific Gas & Electric Co. v. Pub. Util. Comm'n*, 237 Cal. App. 4th 812, 859-60 (2015).

¹⁵ Exh. IOU-01 at 152:5-23.

¹⁶ The Joint IOUs also erroneously claim that CALSSA "misunderstood" the proposal; CALSSA's argument applied to all non-NEM systems. CALSSA Opening Brief, p. 168.

utility.¹⁷ The question of whether the applicability and rates should or could be altered to be relevant to small solar generators would require extensive scrutiny.

The record also lacks any cost-of-service justification for these new standby charges, and therefore the charge—like the GPC—is legally unsupportable under PURPA.¹⁸ As discussed extensively by CALSSA, a proponent of any additional fee on QF¹⁹ customers must analyze and justify this differential rate treatment.²⁰ The Joint IOUs have made none of the required showings related to the proposed standby charge on non-NEM customers. Instead, they claim, without any supporting cost-of-service studies, data, or analysis, that both the GPC and the proposed standby charge “fulfill[] a similar role in ensuring customer generators contribute towards the costs of the grid that they rely on.”²¹ This vague and unsupported claim fails to provide a legitimate cost-based rationale for this charge, and therefore the charge violates PURPA’s anti-discrimination provision.

Finally, the exemption the IOUs seek to end was part of the Commission’s larger efforts to “facilitate the deployment of distributed generation in California[,]”²² a policy objective that is still very much alive in the State.²³ The Commission should not roll back this long-standing policy supporting DG.

B. The GPC Should Not Be Applied to Non-residential Customers.

As CALSSA has demonstrated extensively on the record, the GPC violates both State and Federal law,²⁴ and a GPC on non-residential customers would suffer from the same legal shortcomings.²⁵ In fact, a GPC on non-residential customers is *even harder* to justify under PURPA; not only are the Joint IOUs’ proposed charges not cost-based and not designed in line with FERC’s regulations, but the charges would

¹⁷ See, e.g., PG&E Schedule SB (standby service is for customers that “are regularly and completely provided through facilities not owned by PG&E”).

¹⁸ See CALSSA Opening Comments, pp. 2-7.

¹⁹ See CALSSA Opening Brief, p. 16 (NEM-eligible behind-the-meter solar facilities of 1 MW or less constitute QFs under PURPA. QF status automatically applies to on-site solar generators up to 1 MW. 18 C.F.R. §§ 292.203(d), 292.204(b); FERC Order No. 732, 130 FERC ¶ 61,214, 2010 FERC LEXIS 507 (2010)). The same status would apply to non-NEM solar customers that would be subject to the proposed standby charge.

²⁰ FERC Order No. 69, 45 Fed. Reg. 12,214, 12,228 (providing that rates for sales to QFs must be the rate “that would be charged to the class to which the [QF] would be assigned if it did not have its own generation[,]” unless a utility can demonstrate a cost-based rationale for a different charge and establish that charge: (1) is based on accurate data, (2) is established using consistent system wide costing principles, and (3) applies to the utility’s other customers with similar load or other cost-related characteristics) (emphasis added); 18 C.F.R. § 292.305(a)(2); Commissioner Joint Statement, pp. 1-2.

²¹ Exh. IOU-01 at 152. See also Joint IOU Opening Comments, p. 12.

²² D.01-07-027, pp. 3-4, 72-76.

²³ See, e.g., Cal. Pub. Util. Code § 2827.1(b)(1); D.16-01-044, p. 94 (rejecting standby charges for self-generating customers for NEM-2 on account of the likelihood they would discourage self-generation and are difficult for residential customers to understand).

²⁴ CALSSA Opening Comments, pp. 2-8 and n. 6.

²⁵ See Exh. IOU-01 at 145:10-24 (describing the structure of the non-residential GPC).

be imposed *in addition to* the high fixed charges and demand charges that many commercial and agricultural customers already pay.²⁶ These monthly charges and demand charges are based on cost-of-service studies approved in Commission rate cases, and are therefore properly imposed; piling additional charges that are *not* cost-based on these customers that already pay such significant fees is indefensible under PURPA.²⁷ The NEM 2.0 Lookback Study finds that non-residential solar customers more than cover their average cost of service,²⁸ further undermining any claim that these charges could be cost-based. The fact that the Joint IOUs' methodology for calculating their proposed charge "results in appropriately lower charges for rates with larger demand charges"²⁹ does nothing to remedy the fact that these charges are not cost-based. Smaller charges do not become cost-based because they are smaller; they are still additional to other charges and would need to be justified based on cost of service.

II. OTHER PROPOSED PD MODIFICATIONS THE COMMISSION SHOULD REJECT.

- NEM-2 customers do not bypass the NBCs TURN lists in its Opening Comments;³⁰ they pay them on a netted per-kWh basis,³¹ just like any other customer that has adopted conservation measures. The record does not support making these charges *more* nonbypassable for *just* NEM customers: the impacts of levying yet-to-be-finalized charges in TURN's list have not been studied on the record,³² meaning there is no cost-of-service basis supporting such treatment, nor an assessment of how such charges would impact the solar value proposition.³³ TURN's even more extreme proposal to write a new "indifference" standard into State law for the Commission's NEM program is contrary to clear statutory intent and must be rejected, as explained in more detail in CALSSA's Reply Brief.³⁴ It is also bad policy since NEM customers are not departed load,³⁵ and the IOUs have not procured above-market energy for DER customers since DERs are included in the State's load forecasts.

²⁶ FERC Order No. 69, 45 Fed. Reg. 12,214, 12,228; 18 C.F.R. § 292.305(a)(2); Commissioner Joint Statement, pp. 1-2; CALSSA Opening Brief, p. 133. *See also* Exh. IOU-01 at 145:10-24.

²⁷ CALSSA Opening Brief, p. 133.

²⁸ *Id.*, p. 104.

²⁹ Joint IOU Opening Comments, p. 7.

³⁰ *Opening Comments of TURN on the PD of ALJ Hymes Revising NEM Tariffs and Subtariffs*, pp. 6-8 (Jan. 7, 2022) (TURN Opening Comments).

³¹ *See, e.g.*, Resolution E-4792, OP 7.

³² *Opening Brief of TURN Regarding a Successor to the Current NEM Tariff*, p. 111 (Aug. 31, 2021) (TURN states that the financial impact on customers of *existing* nonbypassable charges is probably understated because "[e]xcluded from this list are a series of pending, proposed or recently approved securitization charges for IOU wildfire costs and other undercollections."); *see also Reply Brief of CALSSA*, pp. 48-51 (Sept. 14, 2021) (CALSSA Reply Brief).

³³ CALSSA Reply Brief, pp. 48-51. TURN's approach also contravenes the Commission's rate design principle to "encourage conservation." D.14-06-029, OP 4.

³⁴ CALSSA Reply Brief, pp. 48-51.

³⁵ Exh. CSA-01 at Attachment 14 (excerpt from A.18-12-009, 19 Tr. 2193:2-12 (PG&E – Maggard)).

- TURN’s proposal to assess the GPC “using either metered or estimated production” is invasive and unnecessary.³⁶ Collecting the GPC on the basis of an estimate of self-consumption will be highly complex, difficult to implement, and even more difficult to predict,³⁷ with the only certainty being such estimates will be wrong every month (just like the GPC).³⁸ TURN’s alternative proposal to install an additional meter on customers’ private property to track actual self-consumption³⁹ contravenes “California’s long-standing interest in the protection of the privacy of utility customers”⁴⁰ and is logistically impractical given the amount of field work that would be required of utilities.⁴¹
- TURN’s emergency dispatch requirements for solar-paired resources⁴² allow a utility to deplete a customer’s battery when it is most needed, discourage storage adoption, undermine a primary purpose of storage investments, and endanger vulnerable customers.⁴³ This proposal cannot currently be implemented,⁴⁴ and, as TURN’s witness conceded, using price signals to influence behavior for the benefit of the grid—a concept CALSSA strongly supports—could better protect vulnerable customers that require batteries at full capacity during blackouts from an accidental discharge by the utility.⁴⁵
- TURN’s proposal to force residential customers to operate as sophisticated market actors by tying export compensation rates to CAISO’s “day-ahead hourly wholesale market prices” after the lock-in period would exacerbate the uncertainty in the PD.⁴⁶ Few residential customers know CAISO exists, let alone have the means to predict or manage exposure to volatile wholesale prices.⁴⁷ The IOUs called this proposal “not practical to implement” until “real time pricing rates are widely available.”⁴⁸ TURN itself admitted as much in hearing *and* briefing.⁴⁹

³⁶ TURN Opening Comments, p. 9.

³⁷ See, e.g., 9 Tr. 1518:22-1520:13 (TRN – Chait) (confirming that there could be a different self-consumption estimate for all 8,760 hours in the year).

³⁸ Exh. CSA-01 at 103:19 to 104:7.

³⁹ Exh. TRN-01 at 48:19-23; Exh. TRN-01 at 50:15 to 51:6; 9 Tr. 1523:25-1524:13 (TRN – Chait).
⁴⁰ D.11-07-056, pp. 10, 21-22, and 71-72.

⁴¹ Exh. CSA-01 at 105:5-11.

⁴² TURN Opening Comments, pp. 12-14.

⁴³ Exh. CSA-02 at 32:1-34:4 (discussing the Joint IOUs’ STORE proposal, which includes a similar dispatch requirement); see Exh. CSA-02 at 63:24-65:2.

⁴⁴ Exh. IOU-01 at 165:3-6 (acknowledging that the dispatch requirements in the IOUs’ STORE proposal will require consideration in a future stakeholder process).

⁴⁵ 9 Tr. 1534:5-1535:28 (TRN – Chait).

⁴⁶ TURN Opening Comments, pp. 5-6.

⁴⁷ See Exh. SVS-01 at 9:12 to 10:6; CALSSA Opening Brief, p. 34; Exh. CSA-02 at 69:3-11.

⁴⁸ Exh. IOU-02 at 51:14-19.

⁴⁹ 9 Tr. 1569:18-26 (TRN – Chait); *Reply Brief of TURN Regarding a Successor to the Current NEM Tariff*, pp. 52-53 (Sept. 14, 2021).

- NRDC’s suggestion to add deed-restricted housing to the definition of “low-income” at least acknowledges that low-income residents that do not qualify for CARE/FERA rates should be included;⁵⁰ however, expanding the definition only to regulated housing would leave out many low-income families. Following the Commission’s ESJ Action Plan’s definitions will be vastly more effective at reaching low-income customers than NRDC’s modification.⁵¹
- IEPA correctly points out that under the PD, the VNEM and NEMA tariffs are essentially a buy-all/sell-all;⁵² however, the fix is not just an exemption from the GPC (which should be eliminated across the board), but either doing on-site netting for these customers or temporarily extending the current tariffs.⁵³ Not harming VNEM is consistent with the PD’s conclusion that changes to the rules for SOMAH projects should not be done at this time because the SOMAH evaluation is not on the record for review.⁵⁴ Aspects of that review are applicable to non-SOMAH VNEM projects.⁵⁵
- Sierra Club’s Opening Comments demonstrate how the PD’s adopted GPC and rate requirements combine to make the proposed storage incentive for existing NEM-2 customers a terrible economic proposition:⁵⁶ “[i]n less than four years, the PD’s storage ‘incentive’ would be consumed by new monthly fees and the former NEM 2.0 customer would now be faced with substantial new charges that would not have been incurred had the customer remained on the NEM tariff for the remainder of their term.”⁵⁷ Sierra Club did not even include reduced export credit value. CALSSA does not oppose the concept of a storage transition incentive, but the amount proposed is so far below what would be needed for participation that it is not a viable proposal. A near-certain lack of participation renders moot the IOUs’ call for a \$300 million cap on the incentives.⁵⁸
- TURN’s call to immediately transfer very large customers to the net billing tariff⁵⁹ is unfair for the same reasons it is unfair to abruptly transition other customers to the successor. The PD correctly finds

⁵⁰ *Opening Comments of NRDC on the PD Revising NEM Tariff and Subtariffs*, p. 3 (Jan. 7, 2022) (NRDC Opening Comments).

⁵¹ *Opening Comments of GRID Alternatives, Vote Solar, and Sierra Club on the PD Revising NEM Tariff and Subtariffs*, pp. 3-7 (Jan. 7, 2022); CALSSA Opening Comments, Appendix A (changes to OP 2). Exh. CSA-35 at 9-10 nn. 6-7 (including customers with household incomes below 80% of AMI and customers in census tracts with household incomes less than 80% of area or state median income).

⁵² *Opening Comments of IEPA on the Proposed NEM Decision*, pp. 5-6 (Jan. 7, 2022).

⁵³ CALSSA Opening Comments, p. 18.

⁵⁴ PD, pp. 139-140.

⁵⁵ Cal. Pub. Util. Code § 2870 (j)(1).

⁵⁶ PD, p. 150.

⁵⁷ *Sierra Club Opening Comments on PD Revising NEM Tariff and Subtariffs*, p. 20 (Jan. 7, 2022).

⁵⁸ Joint IOU Opening Comments, p. 19.

⁵⁹ TURN Opening Comments, pp. 14-15.

a “buffer period will protect customers who are in the process of contracting for NEM 2.0 tariff service.”⁶⁰ Issues related to these larger systems are being addressed in R.11-09-011.⁶¹

III. SOME CHANGES FROM OPPOSING PARTIES SHOULD BE ADOPTED.

A. If Adopted, Hourly ACC Values Should Be Simplified.

The IOUs’ comments acknowledge the PD’s “structure for export compensation is overly complex and may create customer confusion,”⁶² with “96 different line items on the bill” and “for just PG&E’s customers . . . 5,760 possible export credits.”⁶³ This would not only create the customer bill confusion that the IOUs point out, but also challenges for utilities to produce accurate bills and for solar providers to produce accurate customer savings estimates. The IOUs also correctly state: “[t]he differences between climate zone export credits are not significant enough to justify this degree of complexity.”⁶⁴

CALSSA agrees hourly ACC values can help shape customer behavior in positive ways, but they would need to be greatly simplified from the PD’s structure and should only be adopted at the end of a transition glidepath.⁶⁵ The IOUs’ proposal to “aggregate summer and winter into two 24-hour price curves, reducing the number of export prices for any given customer to 48” is reasonable and should be adopted if hourly values are used. However, the IOUs are incorrect in stating that hourly values would need to be aggregated by “either a generic PV profile or a recorded export profile.”⁶⁶ The point of solar-weighted averages, as discussed in testimony and briefs, was to combine separate hourly values into blocks of hours within a day.⁶⁷ Solar weighting of the same hour of the day across a month or season does not make sense. Such hours should be combined with a simple average. For example, the ACC values for the 2-3 pm hour for every day of the summer months would smooth out weather differences and create a value for that hour in the summer season.

The middle ground glidepath proposal from the Sierra Club would also avoid the controversy of how to average ACC hours into TOU periods during the transition period. By starting with hard numbers derived from non-tiered TOU rates and reducing those values by a percentage each year, the glidepath values will be divorced from escalating rates while using the simple TOU structure. When the reduction

⁶⁰ PD, p. 153.

⁶¹ See R.11-09-011, *ALJ Ruling Reopening Record to Consider the Modification of Decision 12-09-018 and Rule 21* (Apr. 7, 2021).

⁶² Joint IOU Opening Comments, p. 14.

⁶³ *Id.*

⁶⁴ *Id.*

⁶⁵ *Id.*, p. 15.

⁶⁶ *Id.*

⁶⁷ See, e.g., CALSSA Opening Brief, pp. 96-97.

meets the level of ACC values, the glidepath is over and export rates are converted to seasonal 24 hour values, as discussed above.

B. Customers That Have Committed to a NEM-2 Installation Should Be Able to Take Service Under NEM-2 During The Buffer Period.

A revised PD must clarify the specific actions required to secure NEM-2 service during the buffer period.⁶⁸ Both CALSSA and the Joint IOUs identify the appropriate requirement as the submission of a complete interconnection application,⁶⁹ but it is essential that the PD also clearly define this cutoff point, to ensure a transparent, organized, and fair transition. Under the current interconnection procedures, for commercial customers, an application that is submitted prior to system installation is clearly defined as a “complete interconnection application.” For residential customers, it is not clear whether an application that is submitted prior to installation and that includes everything except the post-inspection notification from the local building department will be “deemed complete” for purposes of NEM cutoff eligibility.⁷⁰ To ensure a clear and standardized approach despite these ambiguities in the current process, a “complete interconnection application” should be defined for purposes of this cutoff point, for all customer types, as an application that is free of deficiencies but may not yet have the post-inspection notification from the local building department.

C. NRDC’s “Admission” on the Cost of Solar.

NRDC’s comments appear to admit the cost of solar it supported is unreasonable, by vaguely stating, “the Commission must ensure that the installation costs assumed for rooftop solar are reasonable.”⁷¹ The PD’s intended payback periods rely on this critical assumption,⁷² and getting this detail wrong is hugely impactful.⁷³

IV. CONCLUSION

CALSSA urges the Commission to adopt the recommendations herein and in its Opening Comments to ensure solar can continue to grow sustainably in California.

⁶⁸ CALSSA Opening Comments, p. 20 (citing PD, p. 153).

⁶⁹ *Id.*, p. 20; PD, p. 153; Joint IOU Opening Comments, pp. 17-18.

⁷⁰ Exh. CSA-02 at 70:17-27; PG&E Form 79-1151B-02. For residential customers, the interconnection application contains a signed contract, which ensures that projects are completely designed. Exh. CSA-02 at 70:6-71:11.

⁷¹ NRDC Opening Comments, p. 4.

⁷² *Id.*, p. 5; CALSSA Opening Comments, pp. 12-13.

⁷³ CALSSA Opening Comments, pp. 12-13.

Dated: January 14, 2022

Respectfully submitted,

A handwritten signature in dark ink, appearing to read 'Tim Lindl', with a large, sweeping flourish extending to the right.

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Appendix A

List of Acronyms

Acronym	Description
A.	Application
ACC	Avoided Cost Calculator
Cal Advocates	The Public Advocates Office
CAISO	California Independent System Operator
CALSSA	California Solar and Storage Association
CARE	California Alternate Rates for Energy Program
CPUC or Commission	California Public Utilities Commission
CUE	The Coalition of California Utility Employees
D.	Decision
DER	Distributed Energy Resources
DG	Distributed Generation
ESJ	Environmental and Social Justice
GPC	Grid Participation Charge
FERA	Family Electric Rate Assistance Program
FERC	Federal Energy Regulatory Commission
IEPA	The Independent Energy Producers Association
IOU	Investor-Owned Utility
Joint IOUs	Southern California Edison Company, Pacific Gas & Electric Company, and San Diego Gas & Electric Company
kWh	Kilowatt-hour
MTC	Market Transition Credit
NBC	Non-bypassable Charge
NEM	Net Energy Metering
NEMA	Net Energy Metering Aggregation
NRDC	The National Resources Defense Council
OIR	Order Instituting Rulemaking
PD	Proposed Decision
PG&E	Pacific Gas and Electric Company
PURPA	Public Utility Regulatory Policies Act
PV	Photovoltaic
QF	Qualifying Facility
R.	Rulemaking
SCE	Southern California Edison Company
SDG&E	San Diego Gas and Electric Company
SOMAH	Solar on Multifamily Affordable Housing
STORE	Savings Through Ongoing Renewable Energy
TOU	Time of Use
TURN	The Utility Reform Network
VNEM	Virtual Net Energy Metering